NEIGHBORHOOD NETWORK

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WRITTEN TESTIMONY
Submitted by
The Neighborhood Network
to the Minerals Management Service of the U.S. Department of the Interior
Regarding the Scope of the Environmental Impact Statement
for the Long Island Offshore Wind Park

The Neighborhood Network is a Long Island-wide membership-based environmental organization. We are supportive of the concept of offshore wind power for Long Island. We submit these comments in an effort to ensure that the environmental review of the proposed project is comprehensive, scientifically rigorous, and results in the best outcome for the environment and for the people of Long Island.

The Neighborhood Network believes the E.I. S. should quantify and balance the environmental benefits of the proposed wind park, including the offset of local air pollution and greenhouse gasses, against potential negative impacts. Although we expect that the benefits will be found to outweigh the potential harms, any negative impacts that are identified should be mitigated to the greatest extent reasonably feasible.

There is no doubt that the turbines will be visible from Jones Beach State Park, Cedar Beach, Gilgo Beach, and Robert Moses State Park. Therefore, there should be analyses of measures to mitigate aesthetic impact of the wind park.

A) Number of turbines:
The alternative of using a smaller number of larger, higher megawatt turbines should be evaluated. 5 MW turbines are now being introduced. If the use of 5 MW turbines is determined to be commercially feasible by the time the environmental review is complete, it could reduce the number of turbines in the wind park by 25%, without reducing the power generated.

B) Layout of the turbines:
The human eye finds symmetry pleasing. The human mind seeks to create patterns. However, the proposed layout of the turbines would result in an apparently random spacing of the turbines as seen from south shore beaches. (This is demonstrated in photo-simulations on the LIPA website.)

1. There should be an evaluation of layout alternatives that create views with architectural interest when viewed from the shore, particularly from points of interest. A question for the E.I.S. to address is: whether layout that creates lines of turbines and intersecting angles from the perspective of the beach would be perceived as more attractive than a seemingly random agglomeration? (The attached map of a potential layout that features fewer turbines and a less random layout is offered as one example. If the E.I.S. determines that layout can significantly mitigate the aesthetic impact, a professional design study should be conducted to develop a layout that best accomplishes that mitigation.)

2. The layout could create a distinct appearance for the wind park that distinguishes it from other offshore wind parks around the world, as the graceful curve of the Middelgrunden wind farm east of Copenhagen Harbor does. The E.I.S. should investigate whether a unique layout design utilizing a curve, lines, a diamond, or other interesting patters could create a visual "signature" for the Long Island wind park, and thereby mitigate the visual impact.

3. Coin-operated binoculars with informational plaques and maps could be installed at high traffic locations in the view-shed. The layout of the turbines should create a unique appearance from each of these different locations. This would enhance the wind farm's positive features for tourism, and educate the public about alternative energy.

C) Distance from shore:
An analysis should be made of the alternative of decreasing the visual impact by moving the turbines further from shore.

1. With current technology, is it significantly more expensive to place turbines in deeper water? The current proposal states that the monopiles will be placed in 50 to 60 feet of water, however the phase 2 siting study suggests they could be placed in water as deep as 70 feet. If turbines are placed in 70 feet of water, how far from the shore could the turbines be located?

2. Does transmission loss increase significantly if the turbines are located one, two, or even three miles further offshore?

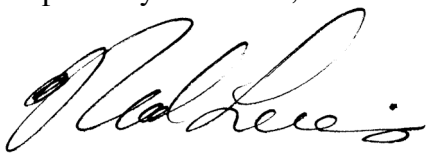
3. What is the Coast Guard recommendation for a minimum buffer from shipping lanes? Is the buffer of 1.5 miles in the current proposal based on experience with existing ocean-based facilities such as other wind turbines, drilling platforms, etc? Are there existing facilities located closer than 1.5 miles to shipping lanes, and what is the record of whether they have presented a hazard to navigation?

4. Considering the current navigational technologies employed in shipping, could the turbines be safely placed within one mile of the shipping lanes, within 0.5 miles, as was suggested in the phase 2 siting study, or even closer?

5. Could the turbines be situated in a straight line along the "median" between the eastbound and westbound shipping lanes?

6. Is it possible for the shipping lanes to be adjusted, so that for example they are 2 miles further from shore in the area of the wind park? What body is in charge of designating shipping lanes, and what is the process for altering shipping lanes? How much, if any, hardship would be placed on navigation if shipping lanes were to be altered in order to locate turbines further from shore?

Respectfully submitted,



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Executive Director
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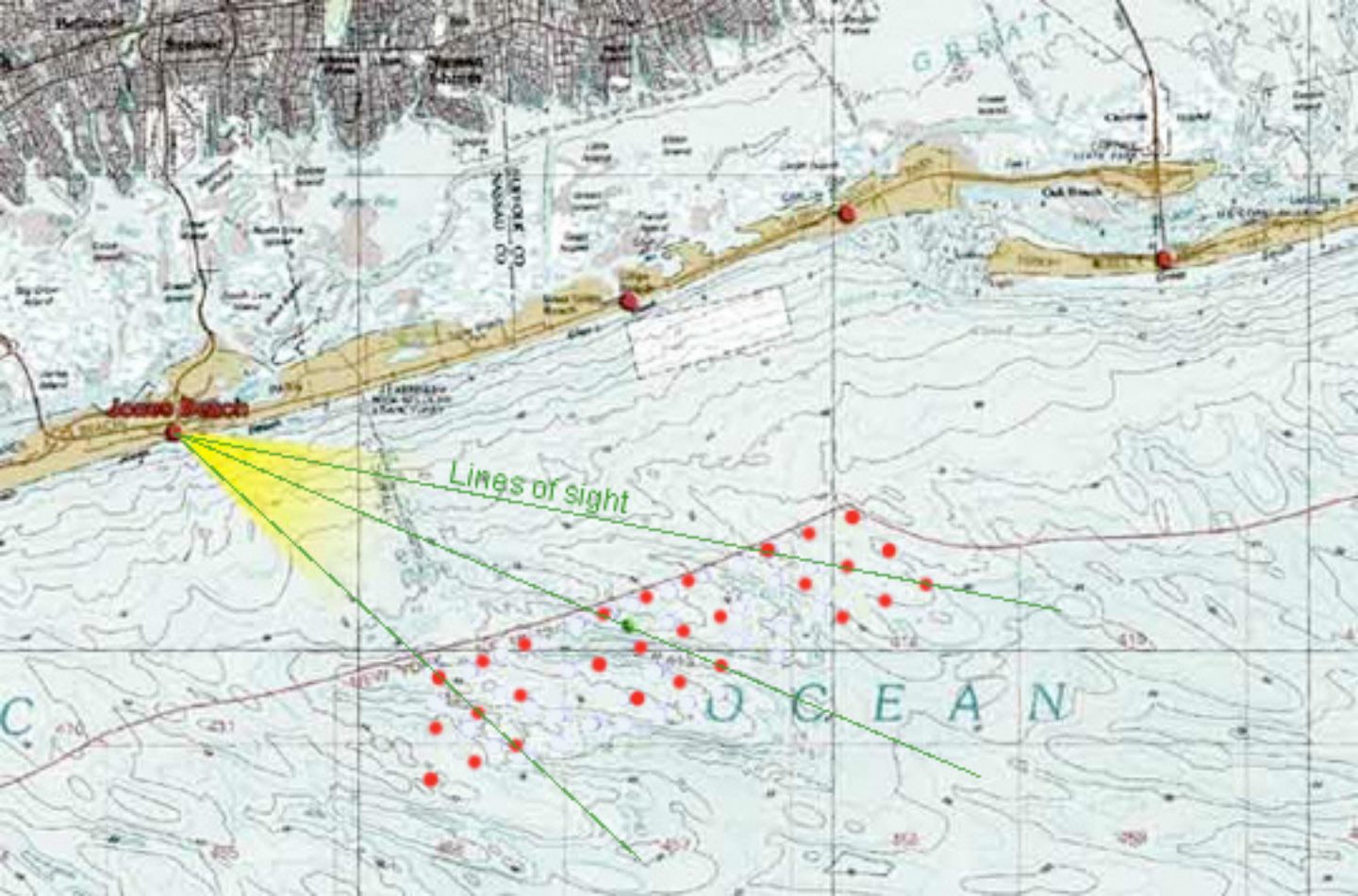
Jones Beach
Lines of sight
OCEAN